

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)
_____)

MDL NO. 1456

Civil Action No. 01-12257-PBS

THIS DOCUMENT RELATES TO)
01-CV-12257-PBS AND 01-CV-339)
_____)

Hon. Patti B. Saris

Chief Mag. Judge Marianne B. Bowler

**THE JOHNSON & JOHNSON DEFENDANTS' MOTION
FOR A PROTECTIVE ORDER RESPECTING NON-PARTY DEONENTS**

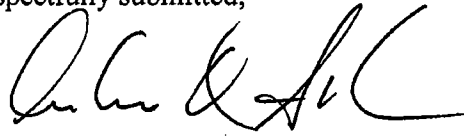
Johnson & Johnson, Centocor, Inc., and Ortho Biotech Products, L.P. respectfully move this Court for a protective order barring plaintiffs from deposing three former Ortho Biotech employees, William Pearson, John Hess, and Patricia Hawley, until after March 15, 2006. The grounds for the motion are set forth in Case Management Order No. 10 and in the accompanying declaration of Andrew D. Schau, and exhibits thereto.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1(a)(2), the undersigned hereby certifies that counsel for Johnson & Johnson, Centocor, Inc., and Ortho Biotech Products, L.P. conferred with counsel for the plaintiffs regarding the issues addressed in this motion, but were unable to resolve or further narrow the issues.

Dated: February 27, 2006

Respectfully submitted,

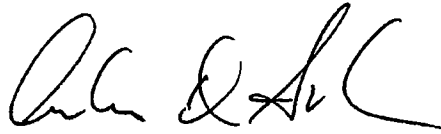


Andrew D. Schau (admitted *pro hac vice*)
Erik Haas (admitted *pro hac vice*)
Adeel A. Mangi (admitted *pro hac vice*)
PATTERSON, BELKNAP, WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036-6710
(212) 336-2000

*Attorneys for Defendants Johnson & Johnson,
Centocor, Inc., and Ortho Biotech Products, L.P*

CERTIFICATE OF SERVICE

I certify that on February 27, 2006, a true and correct copy of the forgoing
JOHNSON & JOHNSON DEFENDANTS' MOTION FOR A PROTECTIVE ORDER
RESPECTING NON-PARTY DEPONENTS was served via LexisNexis on counsel for all
parties.

A handwritten signature in black ink, appearing to read "Andrew D. Schau", written over a horizontal line.

Andrew D. Schau